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November 18, 2021

VIA CM/ECF & EMAIL

The Honorable Victor Marrero (chambersnysdmarrero@nysd.uscourts.gov)
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *National Coalition on Black Civil Participation et al. v. Wohl et al.*, United States
District Court, Southern District of New York, Case No. 1:20-cv-08668

Dear Judge Marrero:

We write on behalf of the Defendants Jacob Wohl, Jack Burkman, J.M. Burkman & Associates, LLC, and Project 1599 (collectively, "Defendants") in the above-referenced matter to address Your Honor's Order dated November 12, 2021. After conferring with our clients, Defendants take no position on the letter motion filed by the National Coalition on Black Civil Participation on November 10, 2021.

While we do not raise any formal objections at this time, Defendants reserve the right to request a motion to sever pursuant to Rule 20(b) of the Federal Rules of Civil Procedure at the appropriate juncture.

Respectfully Submitted,

/s/ David M. Schwartz

/s/ Randy E. Kleinman

cc: All counsel of record (via ECF)

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